
The emissions control industry that AECC represents already released a position paper on this essential piece of legislation in November 2017, during the preparatory work phase[^2]. Today’s paper aims at updating our position in light of the draft regulatory text now available.

In order to allow proper market surveillance, including adequate third-party testing, AECC welcomes the definition of exhaustive Transparency Lists 1 and 2, respectively set out in table 1 and 2 of Appendix 5 of Annex II, on individual vehicle information that is required to carry-out WLTP and RDE tests.

The Moving Average Window methodology which is retained to verify RDE trip normality requires that the vehicle tested for RDE is also tested on WLTP to obtain the reference CO₂ emissions curve. This is made possible via the Transparency List mentioned above and the information included in the vehicle’s Certificate of Conformity.

AECC also welcomes the replacement of RDE data processing methods which sometimes acted in opposite directions and did not provide robust regulation. The new Appendix 6 of Annex IIIA provides appropriate calculation of the final RDE results, particularly in the area where tailpipe emissions measured on the road are directly reported. The proposed annual review of the evaluation factors RFL1 and RFL2 should aim at reducing, as soon as practical, normalisation effects of pollutant emissions by the ratio of CO₂ between WLTP and RDE to enhance robustness and transparency.

Should you need more information, you can contact AECC at info@aecc.eu.


AECC is an international non-profit scientific association of European companies operating worldwide in the research, development, testing and manufacture of key technologies for emissions control. Their products are the ceramic substrates for catalysts and filters; catalysts (substrates with catalytic materials incorporated or coated); adsorbers; filter-based technologies to control engine particulate emissions; and specialty materials incorporated into the catalyst or filter. Members’ technology is integrated in the exhaust emissions control systems of cars, commercial vehicles, buses, non-road mobile machinery and motorcycles in Europe. More information on AECC can be found at [www.aecc.eu](http://www.aecc.eu).

AECC’s members are: BASF Catalysts Germany GmbH, Germany; Ibiden Europe B.V. Stuttgart Branch, Germany; Johnson Matthey PLC, United Kingdom; NGK Europe GmbH, Germany; Solvay, France; and Umicore AG & Co. KG, Germany.

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